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8 ***Additional Counsel on Signature Page***

9  
10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**  
**EASTERN DIVISION**

12 **RAUL NOVOA, JAIME CAMPOS**  
13 **FUENTES, ABDIAZIZ KARIM, and**  
14 **RAMON MANCIA**, individually and  
on behalf of all others similarly situated,

15 *Plaintiffs,*

16 v.

17 **THE GEO GROUP, INC.,**  
18 *Defendant.*

Civil Action No. 5:17-cv-02514-JGB-SHKx

**PLAINTIFFS' NOTICE OF  
MOTION AND MOTION FOR  
CLASS CERTIFICATION**

Date: November 18, 2019

Time: 9:00 a.m.

Courtroom: 1

Judge: The Honorable Jesus G. Bernal

21  
22 TO ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD:

23 PLEASE TAKE NOTICE that, on a date and at a time to be determined by the  
24 Court, at the United States District Court for the Central District of California, 3470  
25 Twelfth Street Riverside, CA 92501-3801, in the Courtroom of the Honorable Judge  
26 Jesus G. Bernal, Courtroom 1, Plaintiffs will, and hereby do, move the Court, pursuant  
27 to Federal Rule of Civil Procedure 23, for an Order: (1) certifying the proposed classes  
28 and designating Raul Novoa, Jaime Campos Fuentes, Abdiaziz Karim, and Ramon

1 Mancia as class representatives; (2) appointing the law firms of Burns Charest, LLP,  
 2 Ahdoot and Wolfson, PC, and the Law Office of R. Andrew Free as class counsel; and  
 3 (3) requiring that notice of this action be provided to the classes.

4 Submitted herewith in support of Plaintiffs' Motion for Class Certification are (1)  
 5 the Memorandum of Points and Authorities in Support of Plaintiffs' Motion for Class  
 6 Certification; (2) the Proposed Order Granting Plaintiffs' Motion for Class Certification;  
 7 (3) the Declaration of Lydia Wright and exhibits thereto; (4) the Declaration of Raul  
 8 Novoa; (5) the Declaration of Jaime Campos Fuentes, in Spanish and English; (6) the  
 9 Declaration of Abdiaziz Karim; (7) the Declaration of Ramon Mancia; (8) the  
 10 Declaration of Gagandeep Marwaha; (9) the Declaration of Fernando Munoz Aguilera,  
 11 in Spanish and English; (10) the Declaration of Daniel Charest; (11) the Declaration of  
 12 Tina Wolfson; (12) the Declaration of R. Andrew Free; and (13) the Declaration of  
 13 Hannah Lopez.

14 This motion is made following conferences of counsel pursuant to Local Rule 7-  
 15 3 and Local Rule 79-5.2.2(b).

16  
 17 Dated: September 27, 2019

/s/ Lydia A. Wright

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**CERTIFICATE OF SERVICE**

On September 27, 2019, I electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, Central District of California, using the electronic case filing system. I hereby certify that I have provided copies to all counsel of record electronically or by another manner authorized by Fed. R. Civ. P. 5(b)(2).

/s/ Lydia A. Wright

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